

# **Exhibit 31**

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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BLACK LOVE RESISTS IN THE RUST by and through  
MARIELLE SHAVONNE SMITH and CHARIS HUMPHREY  
on behalf of its members, SHAKETA REDDEN,  
DORETHEA FRANKLIN, TANIQUA SIMMONS, DE'JON HALL,  
JOSEPH BONDS, CHARLES PALMER, SHIRLEY SARMIENTO,  
EBONY YELDON, and JANE DOE,  
individually and on behalf of a class of all  
others similarly situated,

Plaintiffs,

-vs-

CITY OF BUFFALO, N.Y., BYRON B. BROWN,  
Mayor of the City of Buffalo, in his individual and official  
capacities,  
BYRON C. LOCKWOOD, Commissioner of the  
Buffalo Police Department, in his individual  
and official capacities,  
DANIEL DERENDA, former Commissioner of the  
Buffalo Police Department, in his individual capacity, AARON  
YOUNG, KEVIN BRINKWORTH, PHILIP SERAFINI,  
ROBBIN THOMAS,  
UNKNOWN SUPERVISORY PERSONNEL 1-10,  
UNKNOWN OFFICERS 1-20, each officers of the  
Buffalo Police Department,  
in their individual capacities,

Defendants.  
-----

Examination Before Trial of  
TANQUA SIMMONS, Plaintiff, taken pursuant to the Federal  
Rules of Civil Procedure, in the law offices of HODGSON RUSS  
LLP, The Guaranty Building, 140 Pearl Street, Suite 100,  
Buffalo, New York, taken on May 16, 2023, commencing at  
10:35 A.M., before NICHOLE WINANS, Notary Public.

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1 APPEARANCES:

2 WESTERN NEW YORK LAW CENTER,  
3 By KEISHA A. WILLIAMS, ESQ.,  
4 Cathedral Park Tower,  
5 37 Franklin Street,  
6 Suite 210,  
7 Buffalo, New York 14202,  
8 Appearing for the Plaintiffs.

6 NATIONAL CENTER FOR LAW AND ECONOMIC JUSTICE,  
7 By KARINA K. TEFFT, ESQ.,  
8 50 Broadway,  
9 Suite 1500,  
10 New York, New York 10004,  
11 Appearing for the Plaintiffs.

9 HODGSON RUSS LLP,  
10 By PETER A. SAHASRABUDHE, ESQ.,  
11 The Guaranty Building,  
12 140 Pearl Street,  
13 Suite 100,  
14 Buffalo, New York 14202-4040,  
15 Appearing for the Defendants.

14  
15 (The following stipulations were entered  
16 into by all parties.)

17 It is hereby stipulated by and between counsel  
18 for the respective parties that the oath of the  
19 Referee is waived, that signing, filing and  
20 certification of the transcript are waived, and  
21 that all objections, except as to the form of the  
22 questions, are reserved until the time of trial.  
23

1 (Whereupon, a Facebook Post Bates Simmons 1  
2 was then received and marked as Defendant's  
3 Exhibit P,

4 a Facebook Post Bates Simmons 5 was then  
5 received and marked as Defendant's Exhibit Q, and

6 a Facebook Post Bates Simmons 14 was then  
7 received and marked as Defendant's Exhibit R, for  
8 identification.)  
9

10 T A N I Q U A S I M M O N S,  
11 800 Humboldt Parkway, Buffalo, New York 14211,  
12 after being duly called and sworn,  
13 testified as follows:  
14

15 EXAMINATION BY MR. SAHASRABUDHE:  
16

17 Q. Good morning, Miss Simmons. We met off the  
18 record, my name is Peter Sahasrabudhe, I'm a  
19 lawyer for the City of Buffalo and the Defendants  
20 in a lawsuit you filed along with some other  
21 Plaintiffs. My first question for you today is  
22 have you ever given deposition testimony?

23 A. Yes.

1 Q. In what capacity?

2 A. A civil matter.

3 Q. Were you a party to that matter?

4 A. Yes.

5 Q. Were you a Plaintiff or Defendant?

6 A. I've been both actually.

7 Q. Okay. And have you given testimony in your  
8 capacity as both?

9 A. Yes.

10 Q. How many times have you been a party to a civil  
11 lawsuit?

12 A. A handful of times maybe.

13 Q. When was the last lawsuit you were involved in?  
14 Actually, withdrawn. I'll ask, are you currently  
15 a party to any ongoing or pending litigation?

16 A. No.

17 Q. Okay. So all the litigation you've been involved  
18 with has resolved in one way, shape or form?

19 A. Correct.

20 Q. Okay. When was the last lawsuit that you were  
21 involved with resolved?

22 A. Maybe 20 -- maybe 2018, 2019, somewhere up in  
23 there.

1 Q. A few years ago, fair to say?

2 A. Yes.

3 Q. Have any of your lawsuits involved claims made  
4 against the City of Buffalo or the Buffalo Police  
5 Department?

6 A. No.

7 Q. Okay. So fair to say this is the first time  
8 you've been a Plaintiff in a lawsuit involving  
9 either the City of Buffalo or the Buffalo Police?

10 A. Yes.

11 Q. Okay. While we're on the topic, what kinds of  
12 lawsuits have you been involved in?

13 A. Motor vehicle.

14 Q. Anything else?

15 A. A Plaintiff in a lawsuit, no.

16 Q. So you mentioned you've been a Plaintiff in  
17 lawsuits before, and that's motor vehicle  
18 lawsuits?

19 A. Yeah.

20 Q. I just want to make sure, the lawsuits you've  
21 been a Defendant in, have those also been motor  
22 vehicle cases?

23 A. Yes.



1 Q. Okay. And you've given testimony in your  
2 capacity as a party in those motor vehicle cases?

3 A. Correct.

4 Q. So I'm going to go over some ground rules, I'm  
5 going to do it kind of quickly because I think  
6 you've been through this process before, but I'm  
7 going to do it just so the record is clear and so  
8 we're on the same page. Okay?

9 A. (Indicating yes.)

10 Q. To the best of your ability, can you wait for me  
11 to finish my question before you give an answer?

12 A. Yes.

13 Q. Okay. It's important that my full question gets  
14 transcribed by the court reporter, and that your  
15 full answer is transcribed, so even if you know  
16 what I'm going to ask and you're anticipating  
17 what my next words will be, try to let me finish  
18 to the best of your ability. Okay?

19 A. Yeah.

20 Q. Okay. And we need to give, we need a full verbal  
21 response to all my questions, so I can't have a  
22 shake of the head or a nod of the head because  
23 that doesn't get transcribed in the record. So

1 to the best of your ability, will you give a full  
2 verbal response to all of my questions?

3 A. Yes.

4 Q. Okay. And that includes -- we can't have an  
5 uh-uh or an um-hum, we need the full verbal  
6 response so that the record is accurate. Do you  
7 understand that?

8 A. Yes.

9 Q. All right. You're under oath today, do you  
10 understand what that means?

11 A. Yes.

12 Q. Okay. If you need a break at any time, you're  
13 entitled to take a break, I would just ask that  
14 if there's a question pending, you answer the  
15 question fully, and then we can take the break.  
16 Do you understand that?

17 A. Yes.

18 Q. Okay. From time to time your lawyer may object  
19 to my questions, but unless you're instructed not  
20 to answer the question, you have to answer my  
21 questions truthfully and accurately to the best  
22 of your ability. Do you understand that?

23 A. Yes.

1 Q. Anything I should know about this morning that  
2 might affect your ability to give truthful and  
3 accurate testimony today?

4 A. No.

5 Q. You didn't take any medications or drugs or  
6 substances of any kind that would affect your  
7 ability to give truthful and accurate testimony?

8 A. No.

9 Q. Okay. What, if anything, did you review to  
10 prepare for your testimony today? And I'll  
11 clarify this, I don't want to know the substance  
12 of any conversations you had with your lawyers, I  
13 just want to know documents you reviewed in  
14 preparation for today.

15 A. No. Today?

16 Q. In preparation for today.

17 A. Oh, yes.

18 Q. What documents did you review?

19 A. Some documents with my attorney.

20 Q. Do you recall what those documents were?

21 A. I don't know what that means.

22 Q. So do you recall the documents that you looked  
23 at?

1 A. Yes.

2 Q. Okay. What were the documents that you looked  
3 at?

4 A. Paperwork.

5 Q. Did you review the amended complaint filed in  
6 this action to prepare for your testimony?

7 A. Yes.

8 Q. Okay. Did you review any other documents?

9 A. No.

10 Q. Okay. To the best of your recollection, the only  
11 document you reviewed was the amended complaint?

12 A. Correct.

13 Q. And I take it you did, in fact, meet with your  
14 attorneys in preparation for today?

15 A. Correct.

16 Q. And I don't want to know anything that you said  
17 or anything they said to you, but how many times  
18 did you meet with them?

19 A. Once.

20 Q. About how long was that meeting?

21 A. An hour.

22 Q. Did you do anything else on your own time to  
23 prepare for your testimony today?

1 A. No.

2 Q. How are you currently employed, Miss Simmons?

3 A. Self-employed.

4 Q. Can you describe how you are self-employed?

5 A. What do you mean?

6 MS. WILLIAMS: Objection.

7 BY MR. SAHASRABUDHE:

8 Q. What kind of work do you do?

9 A. Different types of work, lawn care, cleaning.

10 Q. Anything else besides lawn care and cleaning?

11 A. Child care.

12 Q. Anything else?

13 A. (Indicating no.)

14 Q. Is that a no?

15 A. No.

16 Q. Is there a company or organizational name that  
17 you operate under or is it just you in your  
18 personal capacity?

19 A. I have a business name.

20 Q. What is the business name?

21 A. MRS Cleaning Services.

22 Q. How long has MRS Cleaning Services been  
23 operational?

1 A. Since October of 2021 -- no. 2022.

2 Q. Okay. Does MRS Cleaning Services also do lawn  
3 care and child care or is it just cleaning?

4 A. Just cleaning.

5 Q. Okay. When you do lawn care and child care, do  
6 you just do that in your personal capacity?

7 A. Yes.

8 Q. In the past five years, have you had any other  
9 forms of employment?

10 A. No.

11 Q. How about prior to that, in the past ten years?

12 A. Yes.

13 Q. Can you tell me how you were employed?

14 A. I worked for -- I was a federal employee.

15 Q. What kind of work did you do as a federal  
16 employee?

17 A. Worked for the department of treasury.

18 Q. How long did you hold that position?

19 A. Fifteen years.

20 Q. What was your job title?

21 A. A customer contact representative.

22 Q. Why did you leave the department of treasury?

23 A. To pursue other job opportunities.

1 Q. Was it your decision to leave?

2 A. Yes.

3 Q. Okay. You weren't terminated?

4 A. No.

5 Q. What's your highest level of education?

6 A. College.

7 Q. Where did you go to college?

8 A. Erie Community College, Buff State, and Empire  
9 State University.

10 Q. Did you ultimately receive a Bachelor's degree?

11 A. No.

12 Q. When was the last time you attended undergraduate  
13 school?

14 A. 2008.

15 Q. Any plans to complete a Bachelor's degree?

16 A. No.

17 Q. Where do you currently live?

18 A. 800 Humboldt Parkway, Buffalo, New York 14211.

19 Q. How long have you lived there?

20 A. Twenty years.

21 Q. Same address for twenty years?

22 A. Same address for twenty years.

23 Q. Haven't lived anywhere else?

1 A. Haven't lived anywhere else.

2 Q. Do you own or rent the property you live at?

3 A. I own it.

4 Q. And you've owned it for twenty years?

5 A. Yes.

6 Q. Have you ever been a member of an organization  
7 known as Black Love Resists In The Rust?

8 A. No.

9 Q. Ever been to any of their meetings?

10 A. No.

11 Q. Ever been recruited by Black Love Resists In The  
12 Rust?

13 A. No.

14 Q. Do you know anyone who is a member of Black Love  
15 Resists In The Rust?

16 A. No.

17 Q. Do you know any other Plaintiffs in this matter?

18 A. In what capacity?

19 Q. Personally.

20 A. No. Oh, yes. Dorethea Franklin.

21 Q. Okay. How do you know Dorethea Franklin?

22 A. We grew up together.

23 Q. Do you talk to Dorethea Franklin often?



1 A. Yes.

2 Q. When was the last time you spoke to her?

3 A. Yesterday.

4 Q. Did you talk about her deposition?

5 A. In what capacity?

6 Q. Did you talk about the questions that were asked  
7 and the answers she gave at her deposition?

8 A. No.

9 Q. What did you talk about?

10 A. I asked her if she made it to the deposition.

11 Q. Anything else?

12 A. No.

13 Q. Have you ever spoken to her about the allegations  
14 that have been made in this lawsuit?

15 A. In what capacity?

16 Q. At all. I guess withdrawn. Since this lawsuit  
17 was filed, have you spoken to her about the  
18 lawsuit generally?

19 A. Yes.

20 Q. All right. What did you speak about?

21 A. Like when? I mean, I don't understand. It's too  
22 broad for me.

23 Q. Fair. How many conversations have you had with

1 her about the lawsuit since it was filed?

2 A. Multiple.

3 Q. When was the last conversation you had with her  
4 about the lawsuit after the lawsuit was filed?

5 A. Yesterday.

6 Q. Okay. But the only substance of that  
7 conversation was asking her if she made it to the  
8 deposition on time, correct?

9 A. Correct.

10 Q. The conversation really didn't go any further  
11 than that?

12 MS. WILLIAMS: Objection.

13 THE WITNESS: No.

14 BY MR. SAHASRABUDHE:

15 Q. Okay. Before that conversation yesterday, when  
16 was the last time you spoke to her about the  
17 lawsuit?

18 MS. WILLIAMS: Objection.

19 THE WITNESS: Last week.

20 BY MR. SAHASRABUDHE:

21 Q. What did you talk about?

22 A. If she made it to, if she made it in to speak  
23 with the attorneys.

1 Q. Have you spoken to her about the substance of the  
2 lawsuit in the last year or have you just kind of  
3 talked to her about scheduling and making it to  
4 depositions and things along those lines?

5 MS. WILLIAMS: Objection.

6 THE WITNESS: When you say substance, what do you  
7 mean?

8 BY MR. SAHASRABUDHE:

9 Q. The allegations in the complaint, the things that  
10 are raised in the complaint, that kind of thing.

11 A. We talked about the nature of the lawsuit, you  
12 know, about the checkpoints being racist and  
13 discriminatory, generally speaking, yes.

14 Q. Okay.

15 A. But that's about it.

16 Q. Can you recall any other details of the  
17 conversation other than what you just testified  
18 to?

19 MS. WILLIAMS: Objection.

20 THE WITNESS: No.

21 BY MR. SAHASRABUDHE:

22 Q. Have you spoken with any other Plaintiff about  
23 the allegations in the lawsuit?

1 A. No.

2 Q. Do you know any other Plaintiff?

3 A. No.

4 Q. Only person you know personally is Miss Franklin?

5 MS. WILLIAMS: Objection.

6 THE WITNESS: Correct.

7 BY MR. SAHASRABUDHE:

8 Q. I'm going to hand you what we've previously  
9 marked as Defendant's Deposition Exhibit A, and  
10 I'll represent to you this is a copy of the  
11 amended complaint in this action, and you've  
12 already testified this is something you reviewed  
13 with your attorneys, correct?

14 A. Correct.

15 Q. Okay. And I want to draw your attention  
16 specifically to paragraphs two thirty-seven  
17 through two fifty-four. And I guess while you're  
18 looking, did you review paragraphs two  
19 thirty-seven through two fifty-four in  
20 preparation for your testimony today?

21 A. Briefly.

22 Q. Okay. Do you want a second to look over those  
23 paragraphs again?

1 A. Sure.

2 Q. All right. After you've had a second to look  
3 them over and you feel you've reviewed them, let  
4 me know. Okay?

5 A. Yes. I reviewed them.

6 Q. Okay. Fair to say that those paragraphs,  
7 paragraphs two thirty-seven through two  
8 fifty-four describe your experiences with vehicle  
9 and traffic safety checkpoints in the City of  
10 Buffalo between 2014 and 2017?

11 A. Kinda, yes.

12 Q. When you say kinda, is there anything inaccurate  
13 about the description given in paragraphs two  
14 thirty-seven through two fifty-four?

15 A. Well, yeah. Right here, Fox and Moselle, That's  
16 Box and Moselle. And I went through way more  
17 checkpoints, and the times are a little off, but  
18 generally speaking, it's pretty fair.

19 Q. Okay. It's generally accurate, you've seen a few  
20 places where there are slight inaccuracies, fair  
21 to say?

22 A. Yes.

23 Q. And the first thing you pointed out is that

1        subparagraph C of paragraph two thirty-nine, the  
2        street intersection should be Box and Moselle  
3        instead of Fox and Moselle?

4        A. Correct.

5        Q. And you mentioned another point where you said  
6        that it inaccurately states the amount of  
7        checkpoints that you went through?

8        A. Yeah.

9        Q. Can you tell me where that is, where you found  
10       that inaccuracy?

11       A. Paragraph two thirty-eight. Yeah.

12       Q. So paragraph two thirty-eight says between 2014  
13       and '17 you went through at least forty vehicle  
14       checkpoints operated by BPD, correct?

15       A. Correct.

16       Q. And it's your testimony here today it was  
17       probably more than forty, according to your  
18       recollection?

19       A. Oh, absolutely.

20       Q. How many would you say it was?

21       A. I would probably say it was about forty, at least  
22       forty checkpoints -- it's more than forty, in  
23       terms of I couldn't cap it, because I, you know,

1       where I lived, there were -- they were daily.  
2       And they were moving, so I mean, I recall a time  
3       where I went through three checkpoints just to go  
4       get some bread from around the corner from my  
5       house, and that was three going and three coming,  
6       so this is -- that number is just not accurate.

7   Q.   All right.   So it's higher than forty?

8   A.   Correct.

9   Q.   You couldn't put an exact number on it, but as  
10       you sit here today, you know it's higher than  
11       forty?

12  A.   Correct.

13  Q.   Okay.   Any other inaccuracies that you can see in  
14       the paragraphs you reviewed?

15  A.   Now when I read this first paragraph, it says I  
16       work full-time in the health care industry.   I  
17       recall I did do a short time period where I was  
18       working health care, I forgot about that.   And in  
19       paragraph two forty-three, it said something  
20       about waiting five to fifteen minutes, the range,  
21       I just recall it just being on average at minimum  
22       twenty minutes going through the checkpoints,  
23       because you had to go through two access points

1 through the checkpoints, so that was -- that  
2 doesn't seem -- it's just, the average time is  
3 just more than five to fifteen minutes.

4 Q. Okay. So the average interval given for the  
5 length of wait times at a checkpoint stated in  
6 paragraph two forty-three, your testimony today  
7 is that that's understated?

8 A. Correct.

9 Q. And you remember that on the low end, you would  
10 have waited for twenty minutes?

11 A. Correct.

12 Q. Okay. Did you ever -- did you actually time the  
13 amount of time you were waiting at the  
14 checkpoints or is that just based on your general  
15 recollection?

16 MS. WILLIAMS: Objection.

17 THE WITNESS: That's just based upon my general  
18 recollection.

19 BY MR. SAHASRABUDHE:

20 Q. All right. If I could direct your attention to  
21 paragraphs two forty-four through two forty-five.

22 A. Yes.

23 Q. Do paragraphs two forty-four and two forty-five



1 accurately describe, at least in general, the way  
2 that vehicle and traffic safety checkpoints were  
3 operated?

4 A. No. I mean, it does, but it doesn't, because  
5 generally there would be police officer cars that  
6 would be on side streets, as well as line the  
7 street, so that any cars that would see the  
8 checkpoints and attempt to avoid them, a police  
9 officer would immediately go pull them over.

10 Q. So that's a detail that's not contained in  
11 paragraphs two forty-four through two forty-five?

12 A. Correct.

13 Q. But the details that are contained in it are  
14 accurate?

15 A. Yes.

16 Q. Okay. All right. Let's go to paragraph two  
17 forty-six. And so is it fair to say, Miss  
18 Simmons, that paragraph two forty-six describes  
19 that in all the times you went through a  
20 checkpoint, there were five instances where you  
21 were pulled over for a prolonged stop?

22 A. That may be generally correct.

23 Q. Do you agree that there were five instances where

1           you were pulled over for a prolonged stop?

2   A.   There may have been.

3   Q.   Do you agree that there were only two instances  
4       where either you or someone you were driving with  
5       received a traffic ticket at a checkpoint?

6   A.   Can you repeat that?

7   Q.   So paragraph two forty-six alleges that there  
8       were two instances where you or someone you were  
9       driving with received a traffic ticket after  
10      having gone through a checkpoint, correct?

11  A.   Correct.

12  Q.   Is that accurate?

13  A.   I believe so.

14  Q.   Okay. And in one instance, it was for an expired  
15      inspection sticker, correct?

16  A.   Correct.

17  Q.   And that was a ticket you received?

18  A.   Correct.

19  Q.   All right. Was your inspection sticker, in fact,  
20      expired when you received that ticket?

21  A.   As I -- I do -- I don't know. I don't recall.

22  Q.   Do you recall if you went to court and appeared  
23      in connection with that traffic ticket?

1 A. I don't know how that ticket was resolved. I  
2 don't, I don't recall. I don't recall if I  
3 objected to it. I don't, I just don't recall how  
4 that was resolved.

5 Q. And you don't recall one way or the other whether  
6 your inspection sticker was, in fact, expired at  
7 the time you got the ticket?

8 A. Right.

9 Q. Okay. And the other instance is your husband  
10 received a ticket for not wearing a seat belt?

11 A. Yes.

12 Q. Do you recall that instance specifically?

13 A. I do.

14 Q. Okay. Were you driving or was your husband  
15 driving?

16 A. I was driving.

17 Q. All right. Was he in the passenger's seat?

18 A. Yes.

19 Q. All right. Was he, in fact, not wearing a seat  
20 belt?

21 A. He was, he was -- I don't know. I really don't  
22 know. I just recall that we were pulled over,  
23 and we were there for a very long time, because I

1 was upset, I had just came from shopping and I  
2 had perishable items in my car, and it was  
3 extremely hot.

4 Q. Okay. But you don't know one way or -- you don't  
5 have any specific recollection one way or the  
6 other whether he was wearing a seat belt or not?

7 A. Right.

8 Q. Okay. Is it fair to say that neither you nor any  
9 of your passengers were ever cited or arrested  
10 for a non-traffic related offense at a  
11 checkpoint?

12 A. Correct.

13 Q. Okay. And you were never detained, put in  
14 custody as a result of a vehicle and traffic  
15 safety checkpoint, correct?

16 A. Correct.

17 Q. Okay. When was the last time you went through a  
18 checkpoint in the City of Buffalo?

19 A. An official checkpoint or an unofficial  
20 checkpoint?

21 Q. I guess anything that you -- so what we've been  
22 talking about today are the times that you went  
23 through what you recognize to be checkpoints in

1 the City of Buffalo, correct?

2 A. Wait. Can you repeat that?

3 Q. Yes. So is there a distinction in your mind  
4 between an official and an unofficial checkpoint?

5 A. Yes. There's a difference.

6 Q. Okay. What is the difference between an official  
7 and an unofficial checkpoint according to your  
8 understanding?

9 A. One is overt and one is covert.

10 Q. What is a covert checkpoint?

11 A. A covert checkpoint is the police sitting on side  
12 streets of main streets and pulling people over.

13 Q. Okay. Pulling every car over or some cars over?

14 A. I've seen both.

15 Q. Okay. You've seen cars, police cars pulling  
16 every car that drives by over in what you  
17 describe to be a covert checkpoint?

18 A. Correct.

19 Q. All right. And when was the last time you saw  
20 what you described to be a covert checkpoint?

21 A. You can see it daily on Broadway.

22 Q. Okay.

23 A. And other streets.

1 Q. So it's your testimony that every single car  
2 that's driving down those streets gets pulled  
3 over?

4 A. When they set up to do so, yes.

5 Q. Without exception?

6 A. I've seen it with and without.

7 Q. And when was the last time you saw a covert  
8 checkpoint?

9 A. A covert?

10 Q. Yes.

11 A. I haven't seen those. I can't recall the last  
12 time I seen a covert -- wait. I'm sorry. I'm  
13 getting my words confused. Covert, I've seen --  
14 when was the last time I was on -- I want to say  
15 within the last couple of weeks I've seen the  
16 Buffalo Police in action.

17 Q. Okay. So my question to you is -- well, let's do  
18 this. What is your understanding of an overt  
19 checkpoint?

20 A. An overt checkpoint is, you know, when you have  
21 the police lining the streets with tow cars, and  
22 police personnel in the middle of the street.

23 Q. Okay. When was the last time you went through an

1       overt checkpoint?

2       A.   I can't -- it's been a while.

3       Q.   Would you say it's been multiple years?

4       A.   What's multiple?

5       Q.   Has it been more than two years?

6       A.   Yes.

7       Q.   All right.   How about three?

8       A.   Three, I don't know.   I don't know.   I recall  
9       seeing one, and it may have -- it wasn't the last  
10      two years, but it was -- I've seen one prior to  
11      that.

12      Q.   Okay.   So it's been at least two years since  
13      you've seen what you describe as an overt  
14      checkpoint being operated in the City of Buffalo?

15      A.   Yes.

16      Q.   All right.   So back to covert checkpoints.   How  
17      many police vehicles are involved in what you  
18      would describe as a covert checkpoint?

19      A.   I've seen -- I mean, I've seen multiple cars,  
20      like I can't really put a number on it, because  
21      generally speaking, you don't, you don't see them  
22      until they, you know, they pop out of one of  
23      those side streets.

1 Q. Okay. I guess my question to you is this. On  
2 the streets where you say that covert checkpoints  
3 are being operated, is it fair to say that some  
4 cars are pulled over, and some cars drive freely  
5 down the street without being stopped?

6 A. I've seen, like I said, I've seen both. Like  
7 I've seen where you have Caucasian people riding  
8 down Broadway, they don't get pulled over, but  
9 any car that contains someone who is not  
10 Caucasian, I've seen them get pulled over.

11 Q. Okay. So how many cars at once have you seen  
12 been pulled over?

13 A. I've seen, at one time I've seen maybe two or  
14 three cars.

15 Q. Okay. So no more than two or three though?

16 A. No more than two or three that I've seen, you  
17 know, during my duration while I was there.

18 Q. Okay. And there are no officers -- other than  
19 the cars that have pulled the cars over, there  
20 are no other police cars present on the street  
21 blocking traffic or forming what you call an  
22 overt checkpoint?

23 A. Correct.



1 Q. Okay. Have you ever been pulled over in the last  
2 two years in what you describe to be a covert  
3 checkpoint?

4 A. I don't believe so, no.

5 Q. Do you recall one way or the other, did your  
6 husband or you challenge the ticket he got for  
7 not wearing a seat belt or appear in court in  
8 connection with it even?

9 A. No.

10 Q. Meaning you don't recall one way or the other?

11 A. I believe we just paid the ticket.

12 Q. Okay. When was the last time you got a traffic  
13 ticket in the City of Buffalo?

14 A. Wait. Can you repeat that?

15 Q. Yes. When was the last time you received a  
16 ticket for a traffic related offense or violation  
17 in the City of Buffalo?

18 A. I can't recall.

19 Q. Do you recall ever receiving a ticket after the  
20 expired inspection ticket you got in 2012, which  
21 is described in paragraph two forty-six of the  
22 amended complaint?

23 A. Wait. Can you repeat the question?

1 Q. Yes. I'll break it up, because that was --  
2 paragraph two forty-six describes a time where  
3 you got a ticket for having an expired inspection  
4 sticker, correct?

5 A. Correct.

6 Q. Okay. Do you recall a time after that incident  
7 where you received a traffic ticket for anything?

8 A. I do.

9 Q. When?

10 A. But I can't remember when.

11 Q. What was it for, if you remember?

12 A. I think it might have been a ticket about a stop  
13 sign. I can't -- and I can't remember if it was  
14 when it was unofficial --

15 Q. Let me ask you this. Were you pulled over?

16 A. Yes.

17 Q. By a police officer?

18 A. Yes.

19 Q. Okay. And you were given a ticket?

20 A. Yes.

21 Q. Do you recall the outcome or disposition of the  
22 ticket?

23 A. Yes. I ended up having to pay the ticket, I

1 recall that. I went to traffic court.

2 Q. Okay. Was this more than two years ago?

3 A. Yes.

4 Q. Was it more than five years ago?

5 A. That I'm not really sure on.

6 Q. Okay. Was it at what you would describe as an  
7 overt vehicle and traffic safety checkpoint?

8 A. Yes.

9 Q. It was?

10 A. Yes.

11 Q. So it was at a checkpoint where police cars lined  
12 the street?

13 A. Where they sit in the cut, and they on the side  
14 streets, and they pull people over.

15 Q. So that's what you previously described as a  
16 covert checkpoint?

17 A. Correct.

18 Q. So my question, it wasn't at an overt checkpoint?

19 A. No.

20 Q. Okay. Where there's multiple police cars that  
21 are lining the street, and every car that goes  
22 through passes a checkpoint, it wasn't at one of  
23 those?

1 A. Correct.

2 Q. Okay. Do you remember one way or the other  
3 whether you did, in fact, run the stop sign?

4 A. I did not.

5 Q. Okay. And what was the disposition of the  
6 ticket?

7 A. I ended up having to pay the ticket.

8 Q. Did the officer appear in court?

9 A. No. The City of Buffalo allowed another  
10 officer -- they just allowed the officer of the  
11 day to appear on behalf of the city.

12 Q. In that instance, other than receiving the  
13 ticket, were you apprehended or taken into  
14 custody at all?

15 A. No.

16 Q. You were allowed to drive away from the scene?

17 A. Yes.

18 Q. Do you recall how long you were stopped for in  
19 that incident?

20 A. No.

21 Q. Other than the ticket for running a stop sign,  
22 any other traffic tickets you've received besides  
23 the one described in paragraph two forty-six of

1 the amended complaint?

2 A. I do have a recollection, but I'm just not sure  
3 of another ticket, another time I got pulled  
4 over. But I can't remember when that one was.

5 Q. So there was another ticket you received that you  
6 can't specifically recall what it was for?

7 A. It was another stop sign ticket.

8 Q. Okay. And how, was that before or after the stop  
9 sign ticket you just described?

10 A. They were close, but I can't recall. I can't  
11 recall when, but I recall that I received another  
12 stop sign ticket.

13 Q. And that was not at an overt checkpoint, was it?

14 A. No.

15 Q. Okay. Do you recall the disposition or outcome  
16 of that?

17 A. I remember I had to pay the ticket.

18 Q. Okay. Did you show up in court?

19 A. Yes.

20 Q. Did the officer who wrote you the ticket show up  
21 in court?

22 A. No.

23 Q. But you were found to have violated the Vehicle

1 and Traffic Law and you paid a fine?

2 A. Yes.

3 Q. And you weren't arrested, apprehended or placed  
4 into custody as a result of that incident,  
5 correct?

6 A. No.

7 Q. Anything else in the last ten years besides  
8 what's described in paragraph two forty-six and  
9 the two stop sign infractions you've testified  
10 to?

11 A. I don't believe so.

12 Q. I want to talk a little bit more about covert  
13 checkpoints. You've described them as times  
14 where officers are waiting on the side streets or  
15 on the sides of streets and then drive up to  
16 vehicles and pull them over, correct?

17 A. Correct.

18 Q. Okay. So would it be fair to say that when a car  
19 is pulled over in that instance, an officer puts  
20 his lights on and drives behind the car they're  
21 stopping, indicating that they need to pull over  
22 to the side of the road?

23 MS. WILLIAMS: Objection.

1 THE WITNESS: Correct.

2 MR. SAHASRABUDHE: Okay. Can we go off the record?

3 MS. WILLIAMS: Yes.

4 (Whereupon, a short recess was then taken.)

5 BY MR. SAHASRABUDHE:

6 Q. I'm going to hand you what's been marked as  
7 Defendant's Exhibit P. Defendant's Exhibit P is  
8 a copy of a social media post that was produced  
9 by your attorneys. And it's Bates stamped in the  
10 bottom right-hand corner Simmons 1. Do you  
11 recognize this document, Miss Simmons?

12 A. Okay.

13 Q. So this is a social media post of some kind,  
14 correct?

15 A. Correct.

16 Q. Do you know if it was posted to Facebook?

17 A. I'm going to say I guess.

18 Q. And who is Davina L. Blackcloud Jackson?

19 A. She is one of my friends.

20 Q. Okay. And this is her post?

21 A. It appears to be.

22 Q. And you're tagged in it?

23 A. That's my -- it appears to be that way.

1 Q. And it encourages people to vote for you for  
2 mayor as a write-in candidate?

3 A. Correct.

4 Q. Did you run for mayor?

5 A. I did.

6 Q. Okay. As a write-in candidate?

7 A. Correct.

8 Q. And you are critical of the current mayor,  
9 correct?

10 MS. WILLIAMS: Objection.

11 THE WITNESS: Yes.

12 BY MR. SAHASRABUDHE:

13 Q. And your post was actually -- this post is  
14 actually somewhat critical of the mayor's  
15 opponent in the most recent election, correct?

16 MS. WILLIAMS: Objection.

17 THE WITNESS: It appears to be.

18 BY MR. SAHASRABUDHE:

19 Q. Saying that India Walton, the mayor's opponent in  
20 the most recent mayoral election, didn't speak  
21 out against checkpoints, correct?

22 A. Yes, I guess. I don't know.

23 Q. And it's advocating for you as mayor because you



1           are a Plaintiff in this lawsuit and have spoken  
2           out against checkpoints, correct?

3   A.   I mean, that's what it appears to be.

4   MS. WILLIAMS:   Objection.

5   THE WITNESS:   I didn't write it, so I'm just trying  
6           to understand what was being said.

7   BY MR. SAHASRABUDHE:

8   Q.   Well, let me ask you this.   Did you approve of  
9           this message before it was posted?

10   MS. WILLIAMS:   Objection.

11   THE WITNESS:   No.

12   BY MR. SAHASRABUDHE:

13   Q.   Okay.   Do you agree with the representations that  
14           are made in the message?

15   A.   It's kind of confusing, but --

16   MS. WILLIAMS:   Objection.

17   THE WITNESS:   I don't, I don't fully understand it,  
18           so I'm confused.   I'm just really confused.

19   BY MR. SAHASRABUDHE:

20   Q.   Okay.

21   A.   By the post.

22   Q.   Have you seen it before today?

23   A.   No.

1 Q. Okay. And you didn't see it on October 10, 2021  
2 when it purports to have been posted?

3 A. I don't know. I mean, I don't know. That was  
4 then, and reading it now, I just don't recall  
5 this post.

6 Q. Okay. How long did you campaign for mayor?

7 A. How long did I campaign, I don't know.

8 Q. What did you do to campaign as a write-in  
9 candidate for mayor?

10 MS. WILLIAMS: Objection.

11 THE WITNESS: I let people know that I was an option  
12 to be written in if they did not like the current  
13 candidates.

14 BY MR. SAHASRABUDHE:

15 Q. What did you do to let people know that?

16 A. Social media, and just being out in the  
17 community.

18 Q. Did you speak at any events or any -- did you  
19 give any public speeches in connection with your  
20 campaign?

21 A. I don't know. I may have. I may have.

22 Q. Did you ever announce that you were running for  
23 mayor, did you make an official announcement?

1 MS. WILLIAMS: Objection.

2 THE WITNESS: I'm not sure if I did. I mean, I ran  
3 for mayor twice, so I don't -- it's all kind of  
4 jumbled together.

5 BY MR. SAHASRABUDHE:

6 Q. So you ran for mayor in the most recent mayoral  
7 election cycle, correct?

8 A. Correct. And I believe that would be -- that's  
9 maybe where this post is from, the time period.

10 Q. Okay. When did you run for mayor previously?

11 A. 2017.

12 Q. And again, that was the incumbent at the time was  
13 the current mayor, Byron Brown?

14 A. Correct.

15 Q. Okay. Handing you what's been pre-marked as  
16 Defendant's Exhibit Q, this is a social media  
17 post Bates stamped Simmons 5. Take a second to  
18 look that over. Do you recognize what we've  
19 marked as Defendant's Exhibit Q?

20 A. What do you mean do I recognize it?

21 Q. Is Defendant's Exhibit Q a reflection of a social  
22 media post that you made?

23 A. It appears to be.

1 Q. And would that have been on Facebook?

2 A. It may have been.

3 Q. Do you recall making this particular post?

4 A. Roughly.

5 Q. Okay. Fair to say that in this post you describe  
6 the BPD as domestic terrorists?

7 A. That's what it says.

8 Q. Do you believe that to be true?

9 A. I do.

10 Q. Okay. I can take that back. Handing you what's  
11 been pre-marked as Defendant's Exhibit R.  
12 Defendant's Exhibit R is Bates stamped Simmons  
13 14, and this is something we got in discovery  
14 from your attorneys. Miss Simmons, do you  
15 recognize Defendant's Exhibit R?

16 A. I don't know what you mean.

17 Q. Is Defendant's Exhibit R a social media post that  
18 you made?

19 A. It looks like it.

20 Q. Do you recall posting, do you recall posting a  
21 message with similar content to Facebook on  
22 January 13 of 2019?

23 MS. WILLIAMS: Objection.

1 THE WITNESS: I don't know. I may have.

2 BY MR. SAHASRABUDHE:

3 Q. So do you have any reason to dispute that this  
4 is, in fact, a post that you made?

5 A. I don't, I don't know. This is on a piece of  
6 paper, so I don't know.

7 Q. Well, it's produced by your counsel in --

8 A. Okay.

9 Q. -- response to a discovery demand that we made  
10 for your social media posts.

11 A. Okay.

12 Q. But you don't recall, as you sit here today, one  
13 way or the other whether you made this post?

14 A. I may have.

15 Q. Fair to say that in this post you refer to Byron  
16 Brown as a thug?

17 A. That appears to be a typo. It says is this the  
18 same Byron Brown, it should say that instituted  
19 the predatory and discriminatory checkpoints, so  
20 that would appear to be a typo.

21 Q. So it's your testimony that whoever made this  
22 post accidentally typed U-G instead of A-T after  
23 the T-H in the third line down?

1 A. That's what it appears.

2 Q. Okay. So if it was you who made this post, it's  
3 your testimony that you did not intend to use the  
4 word thug?

5 A. Correct.

6 Q. Do you believe Byron Brown to be a thug?

7 MS. WILLIAMS: Objection.

8 THE WITNESS: In what capacity?

9 BY MR. SAHASRABUDHE:

10 Q. In any capacity.

11 MS. WILLIAMS: Objection.

12 THE WITNESS: One way, I may consider him to be a  
13 political thug that uses his authority to create  
14 legislation that is both predatory and  
15 discriminatory, as with the checkpoints. In  
16 those terms he may be construed as a political  
17 thug.

18 BY MR. SAHASRABUDHE:

19 Q. As a politician you view him as a thug?

20 A. He may be viewed as a political thug. No. I  
21 don't know if that would -- you know, how anybody  
22 else would receive that.

23 Q. Okay. And then the post ends, it says black

1       oppression requires black faces. Do you recall  
2       writing that ever?

3       A. I have written that.

4       Q. Okay. And do you dispute that those are your  
5       words?

6       A. I don't say that -- I don't know if I -- I don't  
7       know if this is a post that I created, but black  
8       oppression does require black faces, so that  
9       statement would be correct and accurate.

10      Q. And have you ever used that expression in  
11      reference to Mayor Brown?

12      A. I've used it in reference to the black faces  
13      that --

14      MS. WILLIAMS: Objection.

15      THE WITNESS: -- that help oppress black people.

16      BY MR. SAHASRABUDHE:

17      Q. Do you view Mayor Brown as a black face who helps  
18      to oppress black people?

19      A. He may be considered that, depending on if he  
20      does quid pro quo for your black face.

21      Q. Do you consider him to be a black face that helps  
22      oppress black people?

23      A. In the context of his legislation and his

1 allowance of the checkpoints, I would say the  
2 checkpoints were oppressive, and that he  
3 instituted them or he allowed them to be  
4 instituted as the mayor, and he did not intercede  
5 on behalf of the people, who requested that they  
6 stop the checkpoints because they found them both  
7 oppressive and discriminatory.

8 Q. So is that a yes?

9 A. I don't know. It may be.

10 Q. But you do not dispute that you used those words  
11 to describe Mayor Brown?

12 MS. WILLIAMS: Objection.

13 THE WITNESS: I have used those words to describe  
14 black people who help oppress other black people.  
15 If Byron Brown happens to be oppressing black  
16 people, then it may be applicable.

17 BY MR. SAHASRABUDHE:

18 Q. Okay. So you can't tell me one way or the other  
19 whether you've ever used that expression to  
20 describe Mayor Brown?

21 MS. WILLIAMS: Objection.

22 THE WITNESS: I may have.

23 BY MR. SAHASRABUDHE:



1 Q. And, in fact, if you made this post, you'd agree  
2 with me that you did use that expression --

3 MS. WILLIAMS: Objection.

4 BY MR. SAHASRABUDHE:

5 Q. -- to describe Mayor Brown?

6 MS. WILLIAMS: Objection.

7 THE WITNESS: I'm not sure if that's how it reads. I  
8 think it's subject to interpretation. It's just  
9 stating that black oppression requires black  
10 faces, I suggest you start taking notes.

11 BY MR. SAHASRABUDHE:

12 Q. Okay.

13 A. So I'm not sure if that was in reference to Byron  
14 Brown or if that is just a statement used to  
15 raise people's level of awareness.

16 Q. Well, the post as a whole is critical of the fact  
17 that Byron Brown received an award, correct?

18 MS. WILLIAMS: Objection.

19 THE WITNESS: I don't, I don't know if he received an  
20 award. Where does it say he received an award?

21 BY MR. SAHASRABUDHE:

22 Q. So do you see at the bottom, it says it's a  
23 YouTube dot com link, City of Buffalo Mayor Byron

1 Brown CAO excellence in partnership award  
2 honoree?

3 A. CAO excellence in partnership award. I don't  
4 know. I don't know what that means. CAO, was  
5 the CAO giving him an award? I don't know.  
6 During the -- Community Action Organization. Oh,  
7 he was honored. Was this attached?

8 Q. Yes. So this is the way it was produced by your  
9 attorneys, but the way -- this is a post from  
10 your social media account, and the top purports  
11 to be a post that your account made in reference  
12 to an article or YouTube video discussing Byron  
13 Brown receiving an award in 2019.

14 A. Well, in reading it, I don't know. I don't know  
15 if that -- it just doesn't seem clear to me. Oh,  
16 he's being praised.

17 Q. So the beginning of the post is critical of the  
18 fact that Mayor Brown is being praised, correct?

19 A. That's what it says.

20 Q. Okay. And then it refers to Mayor Brown as a  
21 thug?

22 MS. WILLIAMS: Objection.

23 THE WITNESS: No. Again, we -- that sentence

1 grammatically doesn't make sense when you use the  
2 term thug. It does when you replace thug with  
3 that.

4 BY MR. SAHASRABUDHE:

5 Q. So you would acknowledge that the letters T-H-U-G  
6 appear on the post, correct?

7 A. Correct.

8 Q. Okay. But it's your testimony that that's just  
9 an accident, a typo?

10 A. In reading the sentence, it's a typo.  
11 Contextually, it's a typo.

12 Q. Okay. Complete accident that thug appears after  
13 Byron Brown?

14 MS. WILLIAMS: Objection.

15 THE WITNESS: It appears so.

16 BY MR. SAHASRABUDHE:

17 Q. Okay. Fair to say you're not a fan of Byron  
18 Brown?

19 MS. WILLIAMS: Objection.

20 THE WITNESS: In what context?

21 BY MR. SAHASRABUDHE:

22 Q. Fair to say that you don't agree with some of the  
23 steps Byron Brown has taken as mayor?

1 A. I don't agree with some of the policies, correct.

2 Q. You've been critical of him as mayor?

3 A. I've been critical of his policies.

4 Q. That you claim he's instituted or implemented as  
5 the mayor?

6 A. That he has implemented and instituted.

7 Q. As the mayor?

8 A. As the mayor.

9 Q. Okay. And, in fact, you've tried to run against  
10 him twice --

11 A. Correct.

12 Q. -- for mayor?

13 MR. SAHASRABUDHE: Okay. I have nothing further.

14 MS. WILLIAMS: I don't have anything.

15

16 \* \* \* \* \*

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23

1 I HEREBY CERTIFY that I have read the  
2 foregoing 51 pages and that, except as to those  
3 changes set forth in the attached errata form(s),  
4 they are a true and accurate transcript of the  
5 testimony given by me in the above-entitled  
6 action on May 16, 2023.

7  
8  
9  
10 -----  
11 TANIQUA SIMMONS  
12  
13

14 Sworn to before me this

15  
16 ----- day of ----- 2023.  
17

18  
19 -----  
20 Notary Public.  
21  
22  
23

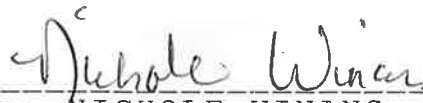
1 STATE OF NEW YORK)

2 SS:

3 COUNTY OF ERIE)

4  
5 I, Nichole Winans, a Notary Public in and  
6 for the State of New York, County of Erie, DO  
7 HEREBY CERTIFY that the testimony of TANIQUA  
8 SIMMONS was taken down by me in a verbatim manner  
9 by means of Machine Shorthand, on May 16, 2023.  
10 That the testimony was then reduced into writing  
11 under my direction. That the testimony was taken  
12 to be used in the above-entitled action. That  
13 the said deponent, before examination, was duly  
14 sworn by me to testify to the truth, the whole  
15 truth and nothing but the truth, relative to said  
16 action.

17 I further CERTIFY that the above-described  
18 transcript constitutes a true and accurate and  
19 complete transcript of the testimony.

20  
21   
22 \_\_\_\_\_  
23 NICHOLE WINANS,  
Notary Public.

ERRATA FORM

PAGE \_\_\_\_\_ LINE \_\_\_\_\_ CORRECTION: \_\_\_\_\_

REASON: \_\_\_\_\_

PAGE \_\_\_\_\_ LINE \_\_\_\_\_ CORRECTION: \_\_\_\_\_

REASON: \_\_\_\_\_

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PAGE \_\_\_\_\_ LINE \_\_\_\_\_ CORRECTION: \_\_\_\_\_

REASON: \_\_\_\_\_

## Taniqua Simmons

1

	8:18, 9:1, 9:22, 10:2, 10:7	35:8, 35:11, 44:20, 50:6	<b>black</b> <sup>[16]</sup> - 45:23, 46:1, 46:7, 46:8, 46:12, 46:15, 46:17, 46:18, 46:20, 46:21, 46:22, 47:14, 47:15, 48:9	48:23, 49:12, 50:13, 50:17, 50:23
<b>'17</b> <sup>[1]</sup> - 21:13	<b>above-described</b> <sup>[1]</sup> - 53:17	<b>APPEARANCES</b> <sup>[1]</sup> - 4:1		<b>BYRON</b> <sup>[2]</sup> - 1:12, 1:14
<b>1</b>	<b>above-entitled</b> <sup>[2]</sup> - 52:5, 53:12	<b>appeared</b> <sup>[1]</sup> - 25:22		<b>C</b>
<b>1</b> <sup>[3]</sup> - 3:5, 5:1, 38:10	<b>absolutely</b> <sup>[1]</sup> - 21:19	<b>Appearing</b> <sup>[2]</sup> - 4:5, 4:12	<b>BLACK</b> <sup>[1]</sup> - 1:5	<b>campaign</b> <sup>[4]</sup> - 41:6, 41:7, 41:8, 41:20
<b>1-10</b> <sup>[1]</sup> - 1:17	<b>access</b> <sup>[1]</sup> - 22:23	<b>appearing</b> <sup>[1]</sup> - 4:8	<b>Blackcloud</b> <sup>[1]</sup> - 38:18	<b>candidate</b> <sup>[3]</sup> - 39:2, 39:6, 41:9
<b>1-20</b> <sup>[1]</sup> - 1:18	<b>accident</b> <sup>[2]</sup> - 50:9, 50:12	<b>applicable</b> <sup>[1]</sup> - 47:16	<b>blocking</b> <sup>[1]</sup> - 31:21	<b>candidates</b> <sup>[1]</sup> - 41:13
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